

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
Greenbelt Division**

In re

Case No. 24-13609-MCR

Smokecraft Clarendon, LLC

Chapter 11

Debtor.

/

**CONSENT MOTION TO CONTINUE CONFIRMATION HEARING**

Comes now Smokecraft Clarendon, LLC (“Smokecraft” or the “Debtor”), by and through undersigned counsel, pursuant to Local Rule 9013-7, and moves to continue the confirmation hearing set in the above-captioned matter for October 7, 2024, and in support thereof notes as follows:

The Debtor has been engaged in conversations with Capital Bank, the primary secured creditor in this matter, as well as the Office of the United States Trustee, and is hopeful that such discussions may lead to the formation of a consensual plan of reorganization. The Debtor has, equally, engaged a third party to appraise the various assets of Smokecraft, in an effort to better understand the value of said assets and the claim(s) secured thereby, with it being reasonably expected the resulting appraisal will be made available to the Debtor in the coming days.

There exists a significant probability—albeit not a certainty—that these discussions, and this appraisal, will invite the docketing of an amended plan of reorganization. The Debtor does *not* believe such a plan will necessarily require re-balloting herein, 11 U.S.C. § 1193, but Smokecraft *does* believe it in the best interests of all parties for any such amended plan to be docketed prior to the immediate eve of a confirmation hearing.

Undersigned counsel can represent that Capital Bank and the United States Trustee both consent to a continuance of the currently scheduled confirmation hearing in this matter.

WHEREFORE, Smokecraft Clarendon, LLC respectfully prays this Honorable Court (i) continue the currently scheduled confirmation hearing from October 7, 2024 to a date certain not less than three (3) calendar weeks thereafter; and (ii) afford such other and further relief as may be just and proper.

Respectfully submitted,

/s/ Maurice B. VerStandig  
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*Counsel for the Debtor*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 30th day of September, 2024, a copy of the foregoing was served electronically upon filing via the ECF system on all counsel who have entered an appearance herein, including:

- Corinne Donohue Adams cadams@yvslaw.com, cadams@yvslaw.com;jbeckman@yvslaw.com;pgomez@yvslaw.com;vmichaelides@yvslaw.com;yvslawcmecf@gmail.com;r39990@notify.bestcase.com
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